

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TREJOS HERMANOS SUCESORES S.A.,

Plaintiff,

v.

Case No. 1:21-CV-08928 (RA)

VERIZON COMMUNICATIONS, INC.,

Defendant.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

Plaintiff Trejos Hermanos Sucesores S.A. (“Trejos Hermanos”) respectfully submits this Motion for Summary Judgment pursuant to New York Civil Practice Law and Rules (“CPLR”) 3213 and 5303 and Federal Rule of Civil Procedure 56. The motion is supported by the accompanying Memorandum of Law, the Affidavit of Rolando Laclé and exhibits thereto, and the Report of Grant Thornton Int’l Ltd. Plaintiff respectfully moves this Court for an Order:

- (a) granting summary judgment in favor of Plaintiff
- (b) recognizing, domesticating, and enforcing the final and conclusive foreign country judgment rendered by the Tribunal Contencioso Administrativo y Civil de Hacienda in Costa Rica on July 19, 2017 (the “Judgment”);
- (c) setting a date for final calculation of the statutory adjustments owed under the Judgment;
- (d) setting a date by which Plaintiff should submit the updated calculation to the Court;
- (e) directing the Clerk of the Court to enter judgment in favor of Trejos Hermanos against Verizon Inc. in the final amount so calculated; and

- (f) imposing post-judgment interest from the date of entry until payment granting Plaintiff summary judgment against Defendant;
- (g) granting such other and further relief this Court deems just and proper.

Dated: November 15, 2021

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By: 

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CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2021, I caused the foregoing to be filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ Benjamin W. Graham
Benjamin W. Graham

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**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S
MOTION FOR SUMMARY JUDGMENT**

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